



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

June 12, 2025

BY ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. William Cosme*, 13 Cr. 43 (LAP)

Dear Judge Preska:

The Government writes to respectfully request an extension of time until July 2, 2025 to respond to defendant William Cosme's recent motions.

On May 22, 2025, a revocation of supervised release hearing was held in this matter. At that conference, the Court addressed, among other things, the defendant's failure to comply with the conditions of his supervised release by not providing the Probation Office with financial information (the "Requested Information"). The Court ordered the defendant to provide the Requested Information by June 6, 2025, if no motion seeking relief from that Order was filed by that date.

On June 3, 2025, the defendant filed a motion asking the Court to clarify alleged "ambiguities" in the Court's May 22 Order concerning the Requested Information. (Dkt. 623). More specifically, the defendant argued that his interpretation of the Court's prior Order allowed him to not produce the Requested Information by the deadline so long as he filed a motion before that date. (Dkt. 623 at 2). In response, the Court ruled that if the defendant filed a motion "before June 6, 2025 arguing he should not be required to submit the [Requested Information], he shall be temporarily relieved of his obligation to comply with the Court's May 22, 2025 order[.]" (Dkt. 624). In addition, the Court directed the Government to respond to any defense motion seven days after any such motion. (Dkt. 624 at 2).

On June 5, 2025, the defendant filed a motion seeking a courtesy copy of the transcript from the May 22 conference and seeking a "clarification" from the Court to the Probation Office that the defendant was not required to resubmit previously provided financial information.¹ (Dkt. 625). On June 9, 2025, the defendant filed three additional motions in which he appears to argue, in part, that he is not required to produce the Requested Information. (Dkts. 626-28).

¹ As of the date of this letter, the defendant has not produced the Requested Information.

The undersigned was recently assigned to the matter, and, therefore, the Government respectfully requests the extension of time to permit the Government to collect necessary records and allow the undersigned to familiarize himself with the case, particularly given the history and potential complexity of this matter. This is the Government's first request for an extension of time to respond to the defendant's motions, and the defendant consents to the extension.

Respectfully submitted,

JAY CLAYTON
United States Attorney

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Special Assistant United States Attorney
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cc: Probation Officer Lauren Blackford (via email)
Probation Officer Charnice Perez (via email)
William Cosme (via mail)

The Government's request for an extension to respond to Defendant's motions is GRANTED. The Government shall respond to Defendants' pending motions by July 2, 2025. The Clerk of the Court shall close docket number 630.

SO ORDERED.

Dated: June 12, 2025



LORETTA A. PRESKA, U.S.D.J.